

Klein Decl. Exhibit 35

1
2 UNITED STATES DISTRICT COURT

3 MIDDLE DISTRICT OF NORTH CAROLINA
4

5 ZION WILLIAMSON

CIVIL ACTION NO.

6 VERSUS

1:19-CV-00593-LCB-JLW

7 PRIME SPORTS MARKETING,
8 LLC AND GINA FORD
9

10
11 VIDEOTAPED DEPOSITION OF SHARONDA ANDERSON, TAKEN AT
12 THE ROOSEVELT NEW ORLEANS, 130 ROOSEVELT WAY, NEW
13 ORLEANS, LOUISIANA, ON THE 10TH DAY OF DECEMBER,
2021, COMMENCING AT 9:02 A.M. AND CONCLUDING AT 4:40
P.M.

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16 REPORTED BY:

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18 RUBY M. WALLEN
19 CERTIFIED COURT REPORTER
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1 Q. With you, your husband, Gina Ford and
2 Prime Sports Marketing, conversation around May 1st
3 of 2019, regarding you, Zion Williamson and your
4 husband wanting more money from Prime Sports
5 Marketing, Gina Ford and Andrew Luchey, after the
6 meeting with Mr. Shervin?

7 MR. KLEIN:

8 Form.

9 BY MR. DRUMMOND:

10 Q. You can answer.

11 A. No. Because we didn't ask for the
12 first amount of money.

13 Q. So is it your testimony that there was
14 no conversation regarding money, getting more money
15 from Prime Sports Marketing after you met with Mr.
16 Shervin, whereas, you said earlier this morning, the
17 conversation was regarding a significant amount of
18 money? Do you remember that?

19 A. Yes.

20 Q. There was no conversation that took
21 place regarding that?

22 MR. KLEIN:

23 Form.

24 THE WITNESS:

25 Regarding what?

1 BY MR. DRUMMOND:

2 Q. Getting more money from Prime Sports
3 Marketing after you met with Mr. Shervin, as you
4 said, advance for Zion Williamson?

5 A. No. Because we didn't ask for the
6 first advance. So there was no conversation about
7 wanting or demanding more. We didn't know to ask for
8 the first amount.

9 Q. I want to take -- you take a look at
10 Williamson Exhibit M and tell me if you recognize
11 that document? Do you recognize that, ma'am?

12 A. Yes.

13 Q. And can you tell us on the front of
14 that document, is that communication from Gina Ford
15 to you?

16 A. Yes.

17 Q. Is that your E-mail there, ma'am?

18 A. Yes.

19 Q. What is the date on the document?

20 A. May 22nd.

21 Q. And what time was it?

22 A. 5:24. I don't know. I don't know
23 what GMT means, what time.

24 Q. And was that E-mail from Miss Ford to
25 your E-mail account?



1 A. It appears so.

2 Q. And does that reflect potential deal
3 opportunities that Miss Ford was working on behalf of
4 Zion Williamson?

5 MR. KLEIN:

6 Objection. Lacks foundation.

7 THE WITNESS:

8 When they came to my E-mail, I didn't
9 know what they were, because there was no discussion
10 prior to what you were sending me. And early on she
11 was asked to stop negotiating all deals on Zion's
12 behalf. So to get this and no background
13 information, I didn't know what they were.

14 BY MR. DRUMMOND:

15 Q. My question is: Did those documents,
16 specifically those documents, reflect potential deal
17 opportunities sent to your E-mail from Miss Ford
18 regarding Zion Williamson? That was my question.

19 MS. RICHARDS:

20 Same objection.

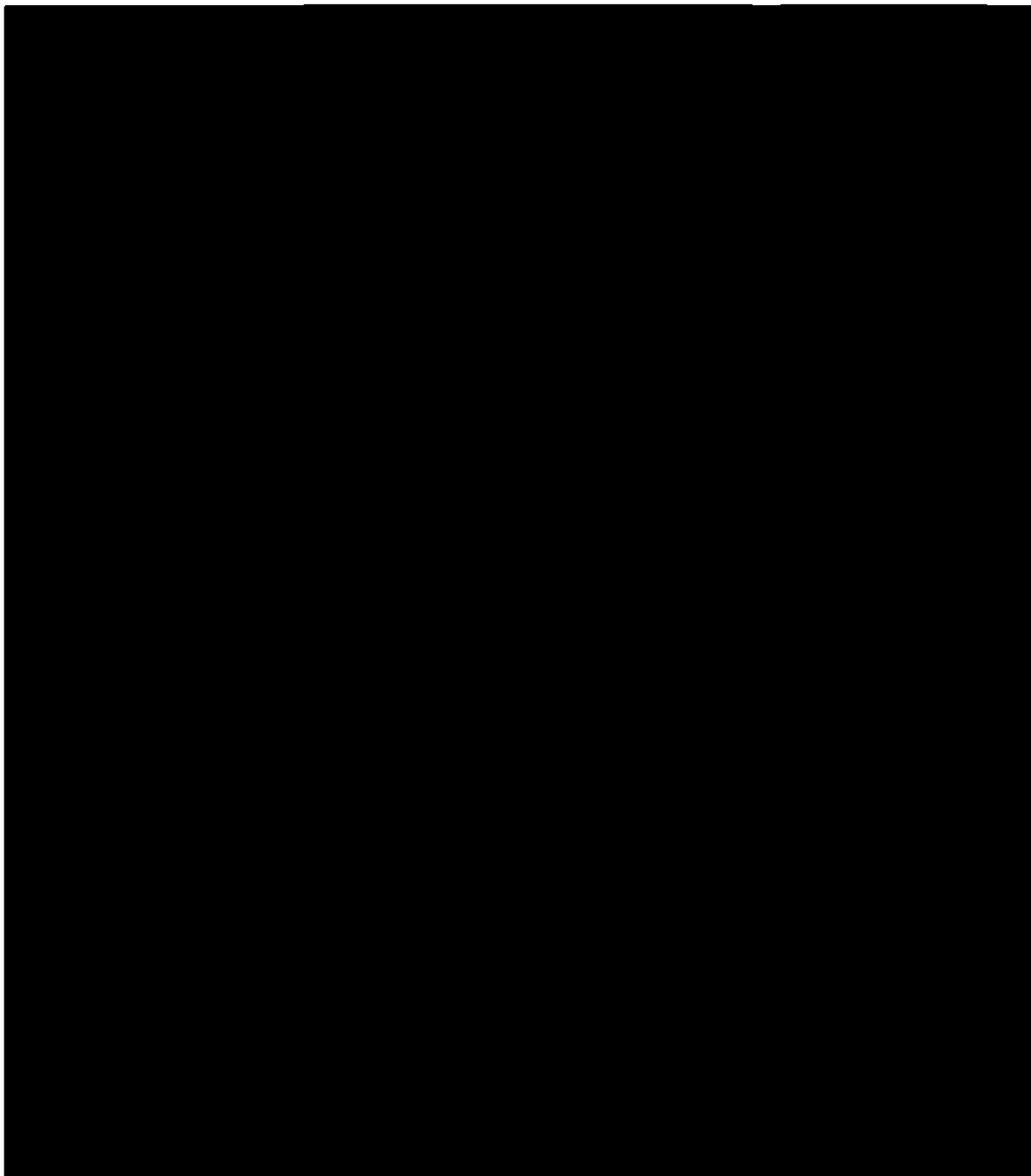
21 BY MR. DRUMMOND:

22 Q. That's the question I'd like for you
23 to answer, please.

24 A. I didn't know what they were. So I
25 couldn't tell you what they reflect because I didn't



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21 Q. Did you and your family demand more
22 money from Prime Sports Marketing after April 20th,
23 2019, after you first received the \$100,000?

24 A. We didn't ask for the first \$100,000.
25 So no. We did not demand more money.

1 Q. Gina Ford to do a similar presentation
2 as the other companies.

3 A. I wasn't looking for her to do a
4 similar presentation.

5 Q. Were you looking for her to tell you
6 about Prime Sports Marketing in some booklet
7 presentation?

8 A. I was looking for her to provide us
9 information about Prime Sports Marketing aside from
10 word of mouth.

11 Q. Okay. So you were looking for
12 something written down, ma'am?

13 A. I was looking for something concrete.
14 Not word of mouth.

15 Q. Written down in a book?

16 A. More concrete, however she --

17 Q. No. Tell us about your definition of
18 concrete. Because you are going to various companies
19 and they gave you stuff that you thought were
20 concrete?

21 A. They gave -- they provided us with
22 information.

23 Q. Yes. And you thought that information
24 was concrete?

25 A. It is something tangible. It's

1 something I can see.

2 Q. It was on a PowerPoint, or in a book
3 format, or some kind of tangible format, as you said.
4 Right, ma'am?

5 MR. KLEIN:

6 Asked and answered at least three
7 times.

8 THE WITNESS:

9 Yes.

10 BY MR. DRUMMOND:

11 Q. So I'm trying to get to, you wanted
12 something written down from Miss Ford?

13 MR. KLEIN:

14 Objection. Asked and answered.

15 BY MR. DRUMMOND:

16 Q. Or you wanted something --

17 What I'm trying to get to, ma'am, you
18 in your own mind, tell me what were you looking for?
19 Words on a paper, words on a PowerPoint presentation?
20 What were you looking for from Miss Ford?

21 A. I was looking for a detailed plan of
22 how she planned -- what was her plan to market Zion.
23 Not just say, I'm going to market him because I did
24 this with Usain Bolt. A concrete plan that you can
25 provide us with step by step. And that was not

1 offered.

